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6 Attorneys for Defendant
7 WAL-MART ASSOCIATES, INC.

8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA
10

11 DEANNA CISNEROS,

12 Plaintiff,

13 vs.

14 WAL-MART ASSOCIATES, INC. and
15 DOE Defendants I-X,

16 Defendant.
17

Case No. 3:17-cv-00661-MMD-WGC

**EMERGENCY STIPULATION AND
[PROPOSED] ORDER FOR DEFENDANT'S
COMPANY REPRESENTATIVE TO
PARTICIPATE AT EARLY NEUTRAL
EVALUATION TELEPHONICALLY**

[FIRST REQUEST]

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19 Plaintiff DEANNA CISNEROS and Defendant WAL-MART ASSOCIATES, INC., by and
20 through their undersigned counsel, hereby stipulate and request that the Court allow Defendant's
21 company representative to participate telephonically on an as needed basis throughout the Early
22 Neutral Evaluation ("ENE") Session presently scheduled for March 12, 2018, at 1:30 p.m. before the
23 Honorable Magistrate Judge Valerie P. Cooke.

24 This emergency request is necessary because Defendant's company representative, George
25 Lopes (Human Resources Manager), who was scheduled to attend the ENE on Walmart's behalf, has
26 experienced a medical emergency in his family which required him to travel to Sacramento,
27 California late Thursday, March 8, 2018. Due to the close family member's medical emergency,
28 which may require surgery this weekend, Defendant's company representative (who has important

1 factual knowledge regarding this case) will likely be unable to attend the ENE as in person.
2 Defendant originally requested that Plaintiff stipulate to reschedule the ENE in light of the issue but
3 Plaintiff has upcoming plans to relocate from Reno and indicates she would incur a hardship were
4 the ENE rescheduled. Accordingly, in the spirit of compromise the parties stipulated that
5 Defendant's company representative can participate ^{as the Court directs UPC} ~~on an as needed basis~~ telephonically throughout
6 the conference if he remains unable to appear in person.

7 This request is made in good faith and not for the purpose of delay.

8 Dated: March 9, 2018

Dated: March 9, 2018

9 Respectfully submitted,

Respectfully submitted,

11 /s/ Mark Mausert
12 MARK MAUSERT, ESQ.

13 Attorney for Plaintiff
14 DEANNA CISNEROS

/s/ Ethan D. Thomas
ROGER L. GRANDGENETT II, ESQ.
ETHAN D. THOMAS, ESQ.
LITTLER MENDELSON, P.C.

Attorneys for Defendant
WAL-MART ASSOCIATES, INC.

15
16 **ORDER**

17 **IT IS SO ORDERED.**

18 Dated: March 9, 2018.

19 
20
21 UNITED STATES MAGISTRATE JUDGE

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